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ade and a factor conference		Authorizad	1,000,000		
Name of person or ergenisation with whom conteact is made made in a conteact in or that otherwise susrcial		Voting or Non-voting	voting		cations: (See franchions 4, 5 and 6)
Description of contract or methument with whom consists is made been defined to methun or majority interest in or that otherwise suscitions do tack control over the subject licenses or premittee.		Class of Stock (preferred, common or ether)	Common		ements concerning family relationships, attribution examptions and certifications:

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Don Linder and Bruce Linder are father and son.

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Line i	(Read cerefully - The numbered home below	refer so line numbers in the	following 19040-)			
(. Ner	me and residence of officer, director, cognizab	le stockholder or pertner	6. Percentage (	of votes.		
Name and residence of officer, director, cognizable stockholder or partner (If other than individual also show hame, address and alternable of natural person authorized to vote the stock). List officers first, then directors and,		7. Öther ext	7. Other existing stributable interests in any other broadcas			
person authorised to vote the attock). Let differ the transfer the attock of the existing attributable interests in any other broadcast station, including nature and age of such interest.						
2. Chi	izenehip.					
3. 011	ice or directorship held.			nership impress of 5% or more (whether or not attrib by corporate officership or directorship, in proedcest	. 00	
4. Nui	mber of shares or nature of partnership inter	est.	the same bro	or entitles in the same market or with overlapping sitedcast service, as described in Sections 73.3655 and	j 76.	
6. <b>N</b> ui	mber of votes.		of the Gommend the posi-	ission's fulse, including the nature and also of such it tion held.	nten	
	(a)	(b)		(e) Mark McVey		
	Don Linder 114 Hannah	Bruce Li 215 Lake	nder Avenue	620 Lake Road		
	Mankato, MN	Spicer,		Ottumwa, IA		
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KKSI (FM) Eddyville, Iowa O-Town Communications, Inc. Ownership Report

## Edibit 1

Don Linder has the following broadcast interests:

-92.34% voting shareholder, officer and director of Minnesota Valley Broadcasting Company

-Minnesota Valley Broadcasting Company is the licenses of KTCE(AM) Mankato, MN and KDCG(FM) North Mankato, MN. It also owns 100% of KMHL Broadcasting Company, licenses of KMHL(AM) and KKCK(FM) Marshall, MN; and owns 49% of Waite Park Broadcasting Company, permittee for a new station at Le Sueur, MN.

-80% voting shareholder, officer and director of Linder Broadcasting of Fort Dodge, Inc., licensee of KRIT(FM) Clarion, IA.

Bruce Linder has following broadcast interests:

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County of Jefferson	)	

## AFFIDAVIT OF DAVID W. BROWN

- I, David W. Brown, being first duly sworn, do hereby state as follows:
- 1. I am president of Rivertown Communications Company,
  Inc., an applicant for a new FM Station at Eldon, Iowa, to
  operate on Channel 28203. I was the proponent of the Channel 282
  allocation to Eldon in January 1991.
- 2. In June, 1991, I was visiting at the home of Mark McVey in Ottumwa, Iowa. Mr. McVey is chief engineer and 20% stockholder of O-Town Communications, Inc., licensee of KKSI-FM, Eddyville, Iowa. (He and I have been acquainted since 1981, and we have worked concurrently at several Iowa stations in the past ten years -- such as KRIT, Clarion, Iowa (owned by the Linder family) and KMCD(AM) and KIIK-FM, Fairfield, Iowa.) During this visit in June 1991, he mentioned my petition for channel 282 at Eldon, and asked if I had located a tower site. I said that I had not. He asked me to consider rebroadcasting KKSI-FM if I were to be awarded the Eldon permit. I responded that it was too early to even think about that. I asked him whather the Linders (who own the remaining 80% of KKSI) were aware of my Eldon petition, and he said that they were. I asked if they planned to file an application for Eldon, and he said he didn't know.
  - 3. On January 18, 1992, Mr. McVey was at KKMI-FM,

subject of the Eldon applications (Rivertown's, and that of Sample Broadcasting Co., L.P.), and stated that the Sample application had been filed to delay the grant of mine, or to prevent me from getting the Eldon station. He said that the Sample transmitter site had been selected to the southeast of Eldon to avoid city-grade contour overlap with KKSI-FM, to enable Bruce Linder to have ownership interests in both stations. He said that the Linders were using Carmela Sample, KKSI's News Director, because of her minority (Hispanic) status. He said that she was bragging about what she was going to do with the Eldon station if her application is granted, and that, in his opinion, she had failed to recognize that Bruce Linder will be controlling her and the station.

- 4. On March 17, 1992, I had dinner with Mark McVey at the Southside Pizza Hut in Ottumwa. Again, he brought up the Eldon situation. He stated that he had been asked by "the Linders" (he was not more specific) to find a transmitter site for the Sample application which would enable city-grade coverage of Eldon without overlapping the city-grade contour of KKSI; that Bruce Linder has a 20% interest in KKSI; that, if Sample is successful, they plan to simulcast KKSI-FM; and that, although he was not familiar with the details concerning the arrangement between Carmela Sample and Bruce Linder, he was certain that the Linders would not let her manage the Eldon station, because of her lack of management experience.
- 5. On April 9, 1992, Bill Collins (who currently is employed at KKMI-FM, Burlington) advised me that in April 1991

(when Collins was employed by Station KKSI-FM), he had a conversation concerning my Eldon petition for rulemaking with Mark McVey. McVey had learned of my Eldon petition, and had said, in the presence of Bill Collins, that "we ought to get Carmela [Sample] to file on that frequency, and then what we ought to do is tie them together so you would have KKSI-FM from here to the Mississippi River." Mr. Collins further informed me on April 9, 1992, that approximately one week earlier (that is, about April 1, 1992), Mark McVey had telephoned him and again brought up the subject of tying KKSI and the Eldon station together, and that McVey also suggested that the Linders would "have a place for David Brown" if I decided to go in with them.

David W. Brown

Sew E. Marton 2/8/93

Subscribed and sworn to before me, a Notary Public, this / 4 day of April, 1992, by David W. Brown.

(SEAL)

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State of Lova

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County of Des Moines

## AFFIDAVIT OF WILLIAM D. COLLINS

I, William D. Collins, being first duly sworn, do hereby state as follows:

I am the "Bill Collins" identified in the affidavit of David W. Brown of this date. I have reviewed that affidavit, and affirm that its description of the conversations between myself and Mark Movey contained in paragraph 5 is true and correct, and

## CERTIFICATE OF SERVICE

I, Donald E. Ward, do hereby certify that I have this 14th day of April, 1992, caused to be served by first class United States Mail, postage prepaid, a copy of the foregoing "PETITION TO DENY" to the following individuals:

John S. Neely, Esq.
Miller & Miller
1990 M Street N.W.
Suite 760
Washington, D. C. 20036
Counsel for Sample Broadcasting Co., L.P.

John S. Neely, Esq.
Miller & Miller
1990 M Street N.W.
Suite 760
Washington, D. C. 20036
Counsel for O-Town Communications, Inc.

Dennis Williams
Chief, FM Branch
Audio Services Division
Mass Media Bureau
Federal Communications Commission
1919 M Street N.W., Room 332
Washington, D.C. 20554

Donald E. Ward